a. With respect to claim 1, claim 1 requires, among other things, (1) a partition member that forms a recess opening and a module that is at least partially receivable within the recess opening and (2) a first release member that is linked to one of a module coupler and a first partition coupler and that includes an interface section that is accessible outside the recess when the partition and module couplers are coupled where the interface section is operable to decouple the module coupler and the first partition coupler to remove the module from the recess opening. Referring to Fig. 29 of the present specification, an exemplary partition member is 220 and an exemplary recess opening is shown at 253. As shown, the partition member is a member that actually forms a portion of a partition system to separate one space from an adjacent space. Referring to Figs. 34-38, an exemplary module coupler is shown at 322 and an exemplary interface section that is operable to decouple the module coupler and the partition coupler is shown at 292.

Referring to Corcorran, Corcorran fails to teach or suggest either of (1) a partition member that forms a recess opening where a module is received within the recess or (2) a release member that is accessible outside a recess when a partition coupler and a module coupler are coupled together.

The Office Action cites Corcorran's Fig. 4 as teaching a partition member 60 that forms a recess where 60 refers to the complete illustrated rigid frame including vertical and horizontal components. As an initial matter, Applicant notes that this rejection is very terse and it is extremely difficult to determine, given the comments in the Office Action, how the Examiner is interpreting Corcorran. In this regard, based on the Office Action it is difficult at best to determine where the Examiner believes that Corcorran teaches a recess in which at least a portion of a module is received. The Office Action indicates that the recess having a recess opening is shown in Fig. 4. Here, Applicant notes that such a vague reference to Fig. 4 could be read in any of three different ways including (1) the spaces formed between adjacent frame members 62, 63, 64, etc.; (2) the slots 66, 68, etc., formed in frame members; or (3) the space between adjacent skin

type panels (see the space in Fig. 4 that is filled by skin strip 90. Complicating Applicant's understanding, regardless of which way the Office Action interpreted Corcorran, none of the interpretations makes sense in the context of claim 1 as none of the interpretations appears to teach or even remotely suggest the claim 1 limitations. To be thorough Applicant addresses each of the possible interpretations of Corcorran hereafter and shows that, regardless of how Corcorran is interpreted, claim 1 is novel there over.

In one interpretation of Corcorran's Fig. 4, the recesses formed by the frame 60 are the spaces formed between adjacent horizontal frame members 62, 63 and 64. Assuming that the space between adjacent horizontal frame members (e.g., members 63 and 64) can be construed as a recess formed by frame 60, clearly, as best illustrated in Corcorran's Figs. 2 and 3, the components that mount thereto including datum shelf 54, upper storage unit 57, etc., are not received at least in part within the recess and instead mount to the front face(s) of the horizontal members. At best, shelf 54 is adjacent a frame member that defines a side of a recess and storage unit 57 is adjacent but spaced from a recess formed by frame 60. Thus, referring to Corcorran's Fig. 3, nothing is located between horizontal frame members 62 and 63 or between horizontal frame members 63 and 64 and therefore nothing is located in the recess formed by the frame assembly (i.e., by "partition member" 60).

In the second interpretation of Corcorran's Fig. 4, connecting slots 66, 68, etc., are interpreted as recesses. Here, that claim 1 requires that at least a receivable section of the module be receivable within the recess formed by the partition member and that a module coupler be carried by the module. Thus, the module coupler is separate but carried by the module. At best Corcorran's Fig. 4 teaches that a coupler 88 or 89 is receivable within the slots 666, 68, etc., and there is no teaching or suggestion that a part of a module (e.g., a shelf or storage cabinet assembly) can also be received within one of the slots 66, 68, etc.

In the third interpretation of Corcorran's Fig. 4, the space between adjacent skins that is filled by strip 90 may be interpreted as a recess. Here, as in the second interpretation, only parts of a coupler (e.g., 87 in Fig. 4) pass into the space between adjacent panel skins and no part of the shelf or storage subassembly (i.e., the "module") is received within the space between the panel skins.

If the Examiner is interpreting Corcorran in some other way as teaching a recess in which a module can at least in part be inserted, Applicant requests that the Examiner be more clear in a following Office Action so that Applicant can respond accordingly.

With respect to the requirement for a release member and an accessible interface section, the Office Action cites elements 88, 89 and 148 as release members and cites column 6, lines 8-13 as teaching that the release member includes an accessible interface section for decoupling couplers. Referring to elements 88, 89 and 148, each of those elements are couplers for coupling to the partition couplers 65, 67 and 68 (see Fig. 4) as opposed to release members. In fact, consistent with Applicant's understanding of elements 88, 89 and 148 being coupler members, each of elements 88, 89 and 148 is akin to elements 147 (see Fig. 14) and 130 (see Fig. 13) that are cited in the Office Action as first module couplers. Moreover, none of elements 88, 89 or 148 are accessible outside the recess when the partition and module couplers are coupled together. In this regard, see Fig. 2 where the couplers that secure shelf 54 to the horizontal frame member (i.e., the member labeled 63 in Fig. 3) are completely hidden when shelf 54 is attached to the member 63 (i.e., when the module and partition couplers are coupled).

Here, it should also be noted that element 87 is not a coupler as that element alone does not facilitate coupling activity. Instead, components 88 and 89 that extend from member 87 facilitate coupling and therefore are more properly referred to as "couplers".

For at least these reasons Applicant believes that claim 1 and claims that depend there from are novel over Corcorran and requests that the current rejection be withdrawn.

With respect to claim 59, claim 59 includes limitations similar to the limitations described above with respect to claim 1 and is novel over Corcorran for the same reasons that claim 1 is novel. Therefore, Applicant requests that the rejection of claim 59 and claims that depend there from over Corcorran be withdrawn.

With respect to claim 84, claim 84 includes limitations similar to the limitations described above with respect to claim 1 and is novel over Corcorran for the same reasons that claim 1 is novel. Therefore, Applicant requests that the rejection of claim 59 and claims that depend there from over Corcorran be withdrawn.

b. With respect to claim 50, claim 50, like claim 1, requires, among other things, a partition member that forms a recess opening and a module that is at least partially receivable within the recess opening. Referring to Fig. 29 of the present specification, an exemplary partition member is 220 and an exemplary recess opening is shown at 253. As shown, the partition member is a member that actually forms a portion of a partition system to separate one space from an adjacent space. As shown best in Fig. 32, an exemplary module 264 is received within the recess opening formed by the partition member 220.

Referring to Corcorran, Corcorran fails to teach or suggest a partition member that forms a recess opening where a module is received within the recess. To this end, the Office Action cites Corcorran's Fig. 4 as teaching a partition member 60 that forms a recess where 60 refers to the complete illustrated rigid frame including vertical and horizontal components. Presumably the recesses formed by the frame 60 are the spaces formed between adjacent horizontal frame members 62, 63 and 64. Assuming that the space between adjacent horizontal frame members (e.g., members 63 and 64) can be construed as a recess formed by frame 60, clearly, as best illustrated in

Corcorran's Figs. 2 and 3, the components that mount thereto including datum shelf 54, upper storage unit 57, etc., are not received at least in part within the recess and instead mount to the front face(s) of the horizontal members. At best, shelf 54 is adjacent a frame member that defines a side of a recess and storage unit 57 is adjacent but spaced from a recess formed by frame 60. Thus, referring to Corcorran's Fig. 3, nothing is located between horizontal frame members 62 and 63 or between horizontal frame members 63 and 64 and therefore nothing is located in the recess formed by the frame assembly (i.e., by "partition member" 60).

For at least these reasons Applicant believes that claim 50 and claims that depend there from are novel over Corcorran and requests that the current rejection be withdrawn.

c. With respect to claim 20, claim 20 further limits claim 1 by requiring that the external section of the module forms a fascia surface that is generally flush with the partition surface when the receivable section of the module is received in the recess. In this regard, Webster's dictionary defines the term "flush" as "(a) having or forming a continuous plane or unbroken surface (flush paneling); (b) directly abutting or immediately adjacent as ...arranged edge to edge so as to fit snugly." (Emphasis added.) Consistent with this meaning of the term "flush" see Fig. 32 of the present application that shows a module that has a fascia surface that is arranged edge to edge with the partition surface about the recess where the fascia surface and the partition surface form a substantially continuous plane.

Turning to Corcorran, Applicant is unclear looking at Figs. 2 and 3 (i.e., the section of Corcorran cited as teaching the flush fascia) which element in Corcorran could be viewed as flush with a partition surface. While shelf and other components clearly abut partition surfaces as best seen in Fig. 2, none of the components mounted to the partition surface appear to form a continuous plane and none appear to be arranged in an edge to edge fashion so as to form a continuous plane. For at least this

additional reason Applicant believes that claim 20 is novel over Corcorran and requests that the rejection be withdrawn.

d. With respect to claim 21, claim 21 further limits claim 1 and requires that the first release member be linked to the first module coupler and be carried by the first module. The Office Action cites elements 88, 89 and 48 as release members. Again, elements 88, 89 and 148 are not release elements. Moreover, whatever elements 88, 89 and 148 are, those elements do not, as required by claim 1, include interface sections that are accessible outside the recess when partition and module couplers are coupled. Thus, for this additional reason Applicant believes that claim 21 is novel over Corcorran and requests that the rejection be withdrawn.

Referring to claim 96, claim 96 limits claim 84 in a manner similar to the way claim 21 limits claim 1 and therefore is novel for the same reasons that claim 21 is novel.

e. With respect to each of claim 36, 75 and 106, each of those claims limits one of independent claims 1, 59 or 84 and requires that the module be one of, among other things, a storage module. While Corcorran teaches a storage module 56, Corcorran fails to teach a storage module that, as required by claim 1, includes a receivable section that is receivable within a recess formed by a partition member. Referring to Corcorran's Fig. 3, storage module 56 clearly is not at least partially receives in a recess formed by the wall structure adjacent thereto – where is the recess in which? For at least this additional reason Applicant believes that each of claims 36, 75 and 106 is novel over Corcorran and requests that the rejection be withdrawn.

4-5. The Office Action rejected each of claims 2-9, 19, 32-35, 37, 51, 60-62, 85-89, 90 and 111 as obvious over Corcorran. Applicant traverses this rejection.

a. With respect to claim 2 that requires that the recess have a height dimension similar to the height dimension of the module and a width dimension that is at least 1.5 times the width dimension of the module, as indicated above, Corcorran fails to teach or suggest a partition member that forms a recess for at least in part receiving a module and therefore it would be impossible for one of skill in the art to read Corcorran and come to the conclusion that a recess for receiving a module (i.e., a feature that is not taught by Corcorran) could be larger than needed to accommodate a module. Moreover, whatever is being read as Corcorran's recess in the Office Action, there is no recess of any type in Corcorran that has a height dimension that is similar to a module height dimension.

Furthermore, while a change in component size is often regarded as obvious, here, where a specific module is to be located within a recess, it is not intuitive to provide a recess having dimensions that are larger than required to house the specific module and the width dimension limitation is functional and not merely an arbitrary dimension change. To this end, in the present case the larger recess is provided so that the module can be placed at different locations within the space (see Fig. 29a) or so that multiple modules can be placed within the single recess (see Fig. 29).

For at least these additional reasons Applicant believes that claim 2 and claims that depend there from are non-obvious over Corcorran and requests that the rejection be withdrawn.

Claim 60 includes limitations similar to claim 2 and is not obvious in light of Corcorran for the same reasons that claim 2 is not obvious.

g. Claim 9 further limits claim 1 by requiring, among other things, a second module that is at least in part receivable within the recess in which the first module is receivable and wherein the two modules are simultaneously receivable. Here, whatever is being read as a recess in Corcorran, clearly there is no single recess in which more than one module is received. For at least this additional reason Applicant believes

claim 9 and claims that depend therefrom are non-obvious in view of Corcorran and requests that this rejection be withdrawn.

n. With respect to claim 85 that requires that the recess have a height dimension similar to the height dimension of the module and a width dimension that is a multiple of the width dimension of the module, as indicated above, Corcorran fails to teach or suggest a partition member that forms a recess for at least in part receiving a module and therefore it would be impossible for one of skill in the art to read Corcorran and come to the conclusion that a recess for receiving a module (i.e., a feature that is not taught by Corcorran) could be larger than needed to accommodate a module. Moreover, whatever is being read as Corcorran's recess in the Office Action, there is no recess of any type in Corcorran that has a height dimension that is similar to a module height dimension.

Furthermore, while a change in component size is often regarded as obvious, here, where a specific module is to be located within a recess, it is not intuitive to provide a recess having dimensions that are larger than required to house the specific module and the width dimension limitation is functional and not merely an arbitrary dimension change. To this end, in the present case the larger recess is provided so that the module can be placed at different locations within the space (see Fig. 29a) or so that multiple modules can be placed within the single recess (see Fig. 29).

For at least these additional reasons Applicant believes that claim 85 and claims that depend there from are non-obvious over Corcorran and requests that the rejection be withdrawn.

Claim 60 includes limitations similar to claim 2 and is not obvious in light of Corcorran for the same reasons that claim 2 is not obvious.

o. With respect to claim 111, claim 111 requires, among other things, a partition member that forms a recess for at least in part receiving a module. As

described above with respect to claim 1, Corcorran fails to teach or suggest a partition member that forms a module receiving recess.

In addition, claim 111 requires that a recess width dimension be at least a multiple of two of a module width dimension. This dimensional limitation is functional in that it allows the module to be placed at different locations within the recess and allows two or more modules, in at least some cases, to be placed in and secured within, a single recess (see Figs. 29 and 29A). Corcorran fails to teach any recess in which a portion of a module is received and therefore cannot possibly teach or suggest a recess that receives more than one module or that can accommodate a single module at different locations.

For these reasons Applicant believes claim 111 is non-obvious in view of Corcorran and requests that the rejection be withdrawn.

6. The Office Action rejected each of claims 10-14, 22-24, 26-30, 52, 54-57, 63-66, 69-71, 73, 91-93, 97-98, 101-102 and 104 as obvious over Corcorran in view of Kelly. Applicant traverses this rejection.

c. With respect to claim 13, claim 13 requires, among other things, electrical and a data recess connectors proximate the recess where a module includes data and electrical connectors for linking to the recess connectors where, when the module is coupled in the recess, the electrical and data connectors are linked. As recognize by the Examiner, Corcorran fails to teach or suggest modules that include data or electrical connectors for linking to the linkages.

While Kelly implies modules that include electrical and data linkage (see col. 11, lines 65-66), Kelly's linkage would likely be in a conventional fashion where cables form the modules would have to be routed through partition wall structure to outlets like those in Kelly's Fig. 3. To this end, electronic displays/blackboards typically include power and data cables that need to be connected to power and data outlets. An example of a conventional power linkage is shown in Fig. 2 of Brown (5,537,290 cited in

the Office Action) where power cables are strung form a display to an outlet. In Kelly the cables would be strung through wire management channels (see Kelly's col. 9, lines 12-21) to outlets for connection and there would be no automatic linking of power and data connectors when modules are coupled into recesses.

Each of claims 24, 28, 54, 55, 57, 66, 71, 93 and 102 include limitations similar to the claim 13 limitations and are non-obvious for the same reasons that claim 13 is not obvious in light of the cited references.

For at least these additional reasons Applicant believes that claims 13, 24, 28, 54, 55, 57, 66, 71, 93 and 102 are each non-obvious over the references cited and requests that the rejections be withdrawn.

7. The Office Action rejected each of claims 31, 74, 105 and 112 as obvious over Corcorran in view of Brown. Applicant traverses this rejection with regard to claim 112.

b. With respect to claim 112, claim 112 requires, among other things, a pan receivable with in a partition member opening where the pan forms a recess for at least in part receiving a module where the recess has a width dimension that is at least a multiple of two of a module width dimension. The claim 112 dimensional limitation is functional in that it allows the module to be placed at different locations within the recess and allows two or more modules, in at least some cases, to be placed in and secured within, a single recess (see Figs. 29 and 29A). Corcorran fails to teach any recess in which a portion of a module is received and therefore cannot possibly teach or suggest a recess that receives more than one module or that can accommodate a single module at different locations.

While Brown teaches a frame, the frame is specifically designed to receive a single module 10/11 and therefore Brown teaches away from providing a pan or frame that includes a recess capable of receiving more than one module or where modules can be placed at different locations within the pan recess.

For these reasons Applicant believes claim 112 is non-obvious in view of Corcorran and Brown and requests that the rejection be withdrawn.

10. Applicant thanks the Examiner for indicating that several of the claims would be allowed if rewritten to include limitations of other claims but will forgo rewriting those claims now because Applicant strongly believes that the independent claims as currently drafted are novel and non-obvious over the cited references.

Applicant has introduced no new matter in making the above remarks. In view of the above remarks, Applicant believes claims 1-112 of the present application recite patentable subject matter and allowance of the same is requested. No fee in addition to the fees already authorized in this and accompanying documentation is believed to be required to enter this amendment, however, if an additional fee is required, please charge Deposit Account No. 17-0055 in the amount of the fee.

Respectfully submitted,

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